

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST  
LITIGATION

Civil No. 18-1776 (JRT/JFD)

This Document Relates to:

ALL CONSUMER INDIRECT  
PURCHASER ACTIONS

**DECLARATION OF SIMON B.  
PARIS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR AN  
AWARD OF ATTORNEYS' FEES  
AND LITIGATION EXPENSES  
SUBMITTED ON BEHALF OF  
SALTZ MONGELUZZI &  
BENDESKY, PC**

I, Simon B. Paris, hereby declare and state as follows:

1. I am a partner of Saltz Mongeluzzi & Bendesky, PC. I submit this declaration in support of Plaintiffs' Motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the above-captioned action (the "Action"). I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel in this matter for Plaintiffs.

3. Attached hereto as **Exhibit 1** is my firm's total hours and lodestar, computed at current rates, for the periods: (1) from the inception of the case through December 31, 2022, and (2) from July 1, 2021 through December 31, 2022. The total number of hours spent by my firm from the inception of the case through December 31,

2022 was 255.00 with a corresponding current lodestar of \$ 95,880.00.<sup>1</sup> The total number of hours spent by my firm from July 1, 2021 through and including December 31, 2022 was 242.70 with a corresponding current lodestar of \$ 87,835.00.<sup>2</sup> This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by the firm. The lodestar amount reflected in **Exhibit 1** is for work assigned by Plaintiffs' Co-Lead Counsel and was performed by professional staff at my law firm for the benefit of the Class/Plaintiffs during the aforementioned time periods. In preparing this time, I followed Co-Lead Counsel's protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing Plaintiffs in the Action, from July 1, 2021 through December 31, 2022 my firm did the following: worked on the discovery for the Hawaii plaintiff and reviewed documents produced by Defendants. The hourly rates for the attorneys and professional staff in my firm reflected in **Exhibit 1** are the usual and customary hourly rates charged by my firm in similar complex litigation matters.

4. From July 1, 2021 through December 31, 2022, my firm has expended a total of \$0.00 in unreimbursed costs and expenses in connection with the prosecution of the Action. These costs and expenses are set forth in the chart attached as **Exhibit 2** and reflected on the books and records of my firm.

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<sup>1</sup> Such time does not include any time expended in completing this declaration.

<sup>2</sup> Such time does not include any time expended in completing this declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 17th, 2023 in Horsham, Pennsylvania.

s/ Simon B. Paris  
SIMON BAHNE PARIS

**EXHIBIT 1****SALTZ MONGELUZZI & BENDESKY, PC****Reported Hours and Lodestar for the Entire Case Period**

Inception of the case through December 31, 2022

<b>Timekeeper</b>	<b>Professional Status</b>	<b>Hours</b>	<b>Current Rate</b>	<b>Total Lodestar</b>
Simon Paris	P	7.40	715	\$ 5,291.00
Simon Paris	P	6.80	775	\$5,270.00
Patrick Howard	P	.60	665	\$ 399.00
Charles Kocher	A	3.80	575	\$ 2,185.00
Anant Rathee	CA	235.90	350	\$ 82,565.00
Briege Hartman	PL	.50	340	\$ 170.00
<b>Grand Total</b>		255.00		\$ 95,880.00

**Reported Hours and Lodestar Following the JBS Settlement**

July 1, 2021 through December 31, 2022

<b>Timekeeper</b>	<b>Professional Status</b>	<b>Hours</b>	<b>Current Rate</b>	<b>Total Lodestar</b>
Simon Paris	P	6.80	775	\$ 5,270.00
Anant Rathee	CA	235.90	350	\$ 82,565.00
<b>Grand Total</b>		242.70		\$ 87,835.00

**Role Legend**

P Partner/Shareholder  
 OC Of Counsel  
 A Associate  
 LC Law Clerk  
 PL Paralegal  
 I Investigator  
 SA Staff Attorney  
 CA Contract Attorney

**Exhibit 2****SALTZ MONGELUZZI & BENDESKY, PC****Expenses Incurred between July 1, 2021 through December 31, 2022**

<b>Expense Category</b>	<b>Amount Incurred</b>
Electronic Research (Lexis/Westlaw/PACER)	
Court Costs – Filing Fees	
Litigation Fund Contribution	
Express Delivery/Messengers	
Photocopies – In House	
Photocopies - Outside	
Postage	
Service of Process Fees	
Telephone / Fax	
Transportation / Meals / Lodging	
Experts/Consultant Fees	
Court Reporter Service/Hearing Transcript Fees	
<b>TOTAL EXPENSES</b>	<b>\$ 0.00</b>